

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

ROBERT JOHN SIMMONS, Individually §  
And as Representative of the ESTATE OF §  
GEORGIA ANN SIMMONS, JEFFREY §  
ROBERT SIMMONS, and SHERRI RENE § CIVIL ACTION NO. 3:14-cv-00488  
BOWMAN, §  
*Plaintiffs,* §  
§  
v. §  
§  
JOE M. FINCE, PsyD; KRANTI §  
PURIMETLA, MD; AILEE FISHER, MD; §  
RHONA MIRANDA, RN; THE TEXAS §  
DEPARTMENT OF STATE HEALTH §  
SERVICES, §  
*Defendants.* §

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**DEFENDANT'S UNOPPOSED MOTION TO EXTEND ANSWER DEADLINE**

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TO THE HONORABLE JANE BOYLE:

Defendant The Texas Department of State and Health Services ("DSHS") moves that the deadline to answer or otherwise respond to Plaintiffs' Original Complaint filed on February 10, 2014 be extended for all Defendants to March 25, 2014. Good cause exists because this case involves multiple parties.

The undersigned counsel has conferred with Plaintiffs' counsel, who is unopposed to this motion.

DATE: February 28, 2014

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

DAVID C. MATTAX  
Deputy Attorney General for Defense  
Litigation

JAMES "BEAU" ECCLES  
Division Chief - General Litigation

/s/ Drew L. Harris

**DREW L. HARRIS**

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with counsel for Plaintiffs, Peter Hofer by phone and email on February 27 and 28, 2014, and he indicated Plaintiffs are unopposed to this motion.

/s/ Drew L. Harris

**DREW L. HARRIS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was sent via Electronic Filing Notification System on this the 28<sup>th</sup> day of February, 2014, to:

Peter Hofer  
Liane Janovsky  
DISABILITY RIGHTS TEXAS  
*Attorneys for Plaintiff*

/s/ Drew L. Harris

**DREW L. HARRIS**